

Remarks

Reconsideration of the above-identified application in view of the present Amendment and following remarks is respectfully requested.

Claims 1-18 were pending in this application. By this paper, Applicant has amended claim 9 and added new claims 19 and 20. Support for the new claims can be found on page 3, lines 18-22 and page 4, lines 3-5, respectively. No new matter has been introduced by virtue of the present Amendment. After entry of this Amendment, claims 1-20 will be pending.

Claims 1-4, 6, 8-12, 14 and 16 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Beltramo (GB 2,082,961), hereinafter referred to as *Beltramo*, in view of van der Kooy (U.S. Patent No. 5,037,690), hereinafter referred to as *van der Kooy*. Applicant respectfully traverses this rejection.

The present invention constitutes a significant and unobvious improvement for the automobile industry. The present invention provides a method of manufacturing panels that are economical, eliminate certain handling issues, have suitable structural integrity for the automobile industry, and are 100% recyclable parts, which is very desirable in this day and age in the automobile industry.

Specifically claim 1 recites a method of producing composite vehicle door panels comprising manufacturing a skin in a vacuum-forming mold, transferring the skin to a RIM mold, applying natural fibers and an isocyanate and resin mixture onto the skin, polymerizing the isocyanate and resin mixture, the natural fibers, and the skin into a composite vehicle door panel.

The Patent Office states at paragraph 4 of the Office Action that *Beltramo* does not disclose using natural fibers. To cure this defect, the Patent Office combines *Beltramo* with *van der Kooy* stating that since *van der Kooy* discloses using natural fibers as a reinforcement material that it would have been obvious to one having ordinary skill in the art to use natural fibers in the process of *Beltramo* in place of its glass fibers because *van der Kooy* teaches providing shaped products which are environmentally friendly and can be processed. Applicant respectfully disagrees with this assertion.

Applicant respectfully submits that there is no motivation to combine *Beltramo* with *van der Kooy*. To begin with, there is no indication in *Beltramo* that it is motivated to look for other types of fiber materials. Furthermore, there is no suggestion in *van der Kooy* that its natural fibers are interchangeable with glass fibers. Importantly, to the contrary, *van der Kooy* distinguishes glass fibers from natural fibers. At column 1, lines 61-67, *van der Kooy* lists glass fibers along with expanded clay granules as a filling material for polyurethane foam. *van der Kooy* does not identify natural fiber as a filling material for polyurethane foam. Later in the application, at column 2, lines 30-54, *van der Kooy* discloses a shaped product having thermoset plastic sheet materials reinforced with coherent natural fiber material. Nowhere in this discussion of the use of a natural fiber material does *van der Kooy* disclose that glass fiber could be a suitable material in addition to the natural fiber material. As such, since *van der Kooy* discloses the use of glass fiber for one purpose and natural fiber for a different purpose, *van der Kooy* effectively teaches away from the modification of *Beltramo* suggested by the Patent Office. Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. § 103 rejection of the claims.

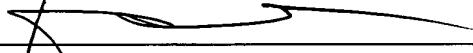
Claims 19-20 have been added. These claims depend from claim 1 and are therefore allowable for at least the same reasons as claim 1. Moreover, these claims add further limitations which render them separately allowable. These further limitations are not disclosed, taught or suggested in the prior art.

Applicant submits that the claims are in a condition for allowance and respectfully request a notice to that effect. If the Examiner believes that a telephone conference will advance the prosecution of this application, such a conference is invited at the convenience of the Examiner.

Please charge any additional fees or credit any overpayments as a result of the filing of this paper to our Deposit Account No. 02-3978 -- a duplicate of this paper is enclosed for that purpose.

Respectfully submitted,

BARI W. BROWN

By 

Michael S. Brodbine
Reg. No. 38,392
Attorney for Applicant

Date: January 6, 2004

BROOKS KUSHMAN P.C.
1000 Town Center, 22nd Floor
Southfield, MI 48075-1238
Phone: 248-358-4400
Fax: 248-358-3351